

**REMARKS**

Claims 1-62 remain pending in the application, with claims 11-23, 34-46, 48 and 49 withdrawn from consideration because of a restriction issued by the Examiner.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

**Claims 1-6, 8, 24-29, 31, 47 and 50-62 over Matsuda**

In the Office Action, claims 1-6, 8, 24-29, 31, 47 and 50-62 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent Application Publication No. 2002/0133573 to Matsuda et al. ("Matsuda"). The Applicants respectfully traverse the rejection.

Claims 1-6, 8, 24-29, 31, 47 and 50-62 recite a system and method relying on a plurality of intelligent messaging network servers that are adapted to perform protocol conversions to allow a client device to **transparently** connect to at least one of a wireless and a wired access network.

Matsuda appears to disclose a system and method for dynamically automatically configuring unadministered networks (See Abstract). Network devices are able to automatically configure themselves for network interoperability with preexisting networked equipment when placed in a network environment that lacks a designed administrator (See Matsuda, 0015). User and group information is passed from one network office appliance device to another once connected to a network (See Matsuda, 0037).

Matsuda provides a system and method of allowing a network device to configure **itself** for network interoperability with preexisting networked equipment. Thus, Matsuda's system requires a client device **itself** to stored a large number of protocols that are potentially needed to connect to various networks (See Matsuda, 0034). Matsuda fails to disclose or suggest a system and method relying on a plurality of intelligent messaging network servers that are adapted to perform protocol conversions to allow a client device to

**transparently** connect to at least one of a wireless and a wired access network, as recited by claims 1-6, 8, 24-29, 31, 47 and 50-62.

A benefit of a system and method relying on a plurality of intelligent messaging network servers that are adapted to perform protocol conversions to allow a client device to **transparently** connect to at least one of a wireless and a wired access network is, e.g., simplification of interoperability and ease of upgradability. Wireless and wired access networks conventionally use a multitude of protocols for communications, with interoperability hampered by such multitude of protocols. Use of intelligent messaging network servers that perform protocol conversions provide a simple system and method of connecting access networks using differing protocols. Moreover, such an intelligent network server that performs protocol conversions eliminates the need to update a large number of client devices when a new or updated protocol is introduced, as is required by Matsuda.

Accordingly, for at least all the above reasons, claims 1-6, 8, 24-29, 31, 47 and 50-62 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 7, 9, 10, 30, 32 and 33 over Matsuda in view of Bell**

In the Office Action, claims 7, 9, 10, 30, 32 and 33 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Matsuda in view of U.S. Patent No. 6,044,081 to Bell et al. ("Bell"). The Applicants respectfully traverse the rejection.

Claims 7, 9, 10, 30, 32 and 33 are dependent on claims 1 and 24 respectively, and are allowable for at least the same reasons as claims 1 and 24.

Claims 7, 9, 10, 30, 32 and 33 recite a system and method of storing a server id and a server type for a first intelligent messaging network server in a database storing server ids and server types for a plurality of intelligent messaging network servers, the plurality of intelligent messaging network servers that are adapted to perform protocol conversions to allow a

client device to **transparently** connect to at least one of a wireless and a wired access network.

As discussed above, Matsuda fails to disclose or suggest a system and method relying on a plurality of intelligent messaging network servers that are adapted to perform protocol conversions to allow a client device to **transparently** connect to at least one of a wireless and a wired access network, as recited by claims 7, 9, 10, 30, 32 and 33.

The Office Action relies on Bell to allegedly make up for the deficiencies in Matsuda to arrive at the claimed features. The Applicants respectfully disagree.

Bell appears to disclose a system and method for communicating a private network signaling message over a packet network and bridges for communicating a MAC layer frame over an isochronous channel (See Bell, col. 1, lines 34-38). Moreover, an isochronous signaling frame can be communicated over a nonisochronous network (See Bell, col. 1, lines 39-40).

Bell discloses bridging differing networks to allow communications therebetween. However, Bell fails to disclose or suggest a **server** that performs protocol conversions, much less a system and method storing a server id and a server type for intelligent messaging network servers that are adapted to perform protocol conversions, as recited by claims 7, 9, 10, 30, 32 and 33.

Thus, Matsuda modified by the disclosure of Bell would still fail to disclose a system and method storing a server id and a server type for intelligent messaging network servers that are adapted to perform protocol conversions, as recited by claims 7, 9, 10, 30, 32 and 33.

Accordingly, for at least all the above reasons, claims 7, 9, 10, 30, 32 and 33 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William H. Bollman" with some additional scribbles and the number "36,457" written below it.

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